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9	Attorneys for Plaintiff	PUBLIC DISCLOSURE
10	IN THE UNITED STAT	TES DISTRICT COURT
11	FOR THE DISTRICT OF ARIZONA	
12	United States of America,	No. CR-24-00693-PHX-SPL (ESW)
13	Plaintiff,	INDICTMENT
14	VS.	VIO: 18 U.S.C. §§ 922(g)(1) and
15		924(a)(8)
15	Yousif Muthana Al Saqat,	(Felon in Possession of a Firearm(s))
16	Yousif Muthana Al Saqat, Defendant.	(Felon in Possession of a Firearm(s)) Count 1
16 17	•	(Felon in Possession of a Firearm(s)) Count 1 26 U.S.C. §§ 5845(a), 5861(d), and 5871
16	•	(Felon in Possession of a Firearm(s)) Count 1 26 U.S.C. §§ 5845(a), 5861(d), and
16 17 18	•	(Felon in Possession of a Firearm(s)) Count 1 26 U.S.C. §§ 5845(a), 5861(d), and 5871 (Possession of an Unregistered Firearm) Count 2 18 U.S.C. §§ 922(g)(1) and
16 17 18 19	•	(Felon in Possession of a Firearm(s)) Count 1 26 U.S.C. §§ 5845(a), 5861(d), and 5871 (Possession of an Unregistered Firearm) Count 2 18 U.S.C. §§ 922(g)(1) and 924(a)(8) (Felon in Possession of
16 17 18 19 20	•	(Felon in Possession of a Firearm(s)) Count 1 26 U.S.C. §§ 5845(a), 5861(d), and 5871 (Possession of an Unregistered Firearm) Count 2 18 U.S.C. §§ 922(g)(1) and 924(a)(8)
16 17 18 19 20 21	•	(Felon in Possession of a Firearm(s)) Count 1 26 U.S.C. §§ 5845(a), 5861(d), and 5871 (Possession of an Unregistered Firearm) Count 2 18 U.S.C. §§ 922(g)(1) and 924(a)(8) (Felon in Possession of Ammunition) Count 3
16 17 18 19 20 21 22 23 24	•	(Felon in Possession of a Firearm(s)) Count 1 26 U.S.C. §§ 5845(a), 5861(d), and 5871 (Possession of an Unregistered Firearm) Count 2 18 U.S.C. §§ 922(g)(1) and 924(a)(8) (Felon in Possession of Ammunition)
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16 17 18 19 20 21 22 23 24	•	(Felon in Possession of a Firearm(s)) Count 1 26 U.S.C. §§ 5845(a), 5861(d), and 5871 (Possession of an Unregistered Firearm) Count 2 18 U.S.C. §§ 922(g)(1) and 924(a)(8) (Felon in Possession of Ammunition) Count 3 18 U.S.C. §§ 922(a)(6) and 924(a)(2) (Material False Statement During the Purchase of a Firearm) Count 4

THE GRAND JURY CHARGES:

COUNT 1

On or about July 2, 2023, in the District of Arizona, Defendant YOUSIF MUTHANA AL SAQAT, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed one or more firearms, which had previously been shipped or transported in interstate or foreign commerce, to wit:

- 1) One Glock, Model 17 Gen 5, 9 x 19 mm caliber pistol, serial# BYYU716; and
- 2) One Palmetto State Armory, Model PX9, 9 x 19 mm caliber rifle, serial# X9-003193;

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 2

On or about July 2, 2023, in the District of Arizona, Defendant YOUSIF MUTHANA AL SAQAT did knowingly possess a firearm, that is: a Palmetto State Armory, Model PX9, 9 x 19 mm caliber, short-barreled rifle, bearing serial number X9-003193, which had an overall length of less than 26 inches and a barrel length of less than 16 inches, that was not registered to him in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5845(a), 5861(d), and 5871.

COUNT 3

On or about July 20, 2023, in the District of Arizona, Defendant YOUSIF MUTHANA AL SAQAT, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit:

- 1) Two-hundred seven (207) live rounds of 9 x 19 mm caliber ammunition bearing a known Blazer brand head stamp,
- 2) Ninety-five (95) live rounds of 7.62 x 39 mm caliber ammunition bearing a known Arsenal brand head stamp,

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- Fifty-one (51) live rounds of 9 x 19 mm caliber ammunition bearing a known 3) Hornady brand head stamp,
- 4) One (1) live round of .22 LR caliber ammunition bearing a known Federal brand head stamp, and
- Forty (40) live rounds of .45 ACP ammunition bearing a known Winchester 5) brand head stamp,

which all had previously been shipped or transported in interstate or foreign commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 4

On or about March 24, 2023, in the District of Arizona, Defendant YOUSIF MUTHANA AL SAQAT knowingly made false statements and representations in connection with the acquisition of a firearm to Tombstone Tactical, which were intended and likely to deceive the business as to a fact material to the lawfulness of a sale of a firearm by the business, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the business, in that Defendant YOUSIF MUTHANA AL SAQAT did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that he had not been convicted a felony offense, or of a crime punishable by a term of imprisonment exceeding one year, whereas in truth and fact, Defendant YOUSIF MUTHANA AL SAQAT knew that he had a prior felony conviction that was punishable by a term of imprisonment of more than one year, and that he was unable to lawfully purchase a firearm.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATION

The Grand Jury realleges and incorporates the allegations of Counts 1 through 4 of this Indictment, which are incorporated by reference as though fully set forth herein.

Pursuant to 18 U.S.C. §§ 924(d) and 981, 21 U.S.C. §§ 853 and 881, and 28 U.S.C.

§ 2461(c), and upon conviction of the offense(s) alleged in Counts 1 through 4 of this Indictment, Defendant shall forfeit to the United States of America all right, title, and interest in (a) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of the offense, and (b) any of Defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense as to which property Defendant is liable, including, but not limited to, the following property involved and used in the offense:

- 1) One Glock, Model 17 Gen 5, 9 x 19 mm caliber pistol, serial# BYYU716;
- 2) One Palmetto State Armory, Model PX9, 9 x 19 mm caliber rifle, serial# X9-003193;
- 3) Two-hundred seven (207) live rounds of 9 x 19 mm caliber ammunition bearing a known Blazer brand head stamp;
- 4) Ninety-five (95) live rounds of 7.62 x 39 mm caliber ammunition bearing a known Arsenal brand head stamp;
- 5) Fifty-one (51) live rounds of 9 x 19 mm caliber ammunition bearing a known Homady brand head stamp;
- 6) One (1) live round of .22 LR caliber ammunition bearing a known Federal brand head stamp; and
- 7) Forty (40) live rounds of .45 ACP ammunition bearing a known Winchester brand head stamp,

If any of the above-described forfeitable property, as a result of any act or omission of Defendant:

- (1) cannot be located upon the exercise of due diligence,
- (2) has been transferred or sold to, or deposited with, a third party,
- (3) has been placed beyond the jurisdiction of the court,
- (4) has been substantially diminished in value, or
- (5) has been commingled with other property which cannot be divided without difficulty,

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it is the intent of the United States to seek forfeiture of any other property of said Defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p). All in accordance with Title 18, Untied States Code, Sections 924(d) and 981, Title 21, United States Code, Sections 853 and 881, Title 28, United States Code, Section 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure. A TRUE BILL FOREPERSON OF THE GRAND JURY Date: April 23, 2024 GARY M. RESTAINO United States Attorney District of Arizona BENJAMIN GOLDBERG SHEILA PHILLIPS Assistant U.S. Attorneys

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